SANDLER, REIFF & YOUNG, P.C.

January 13, 2011

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re:

MUR 6411

Respondent Citizens for Strength and Security

Dear Mr. Jordan:

I am respending on behalf of Citizens for Strength and Security ("CSS"), an unincorporated association organized under Section 527 of the Internal Revenue Code, to a frivolous complaint filed by Cleta Mitchell and Colin Hanga.

Ms. Mitchell and Mr. Hanna incorrectly allege that simply because CSS ran a television advertisement after two news reports happened to indicate that some Members of Congress were frustrated at the amount of third-party spending for Democrats that CSS's advertisement amounted to a coordinated communication. They are wrong on the facts and the law.

CSS exercises their Constitutional right to speak on issues of importance in citree presentity to an election and did so without containating with any conditate, campaign committee, or party committee in full compliance with the requirements set forth in the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §431 et seq.) (the "Aut"), and Federal Election Commission regulations.

We respectfully request that the Commission find "no reason to believe" there was a violation and close this matter with respect to CSS for the reasons stated below.

1. Factual Background

CSS was established on August 22, 2008 for the purpose of communicating with the public on issues of importance in a manner that does not expressly advocate the election or defeat of any clearly identified federal, state, or local candidates. CSS first began running issue advocacy communications in October 2008² and cantinued in 2009 and 2010.

² Sin Rehibit 2, FBC Form 9 (Oct. 3, 2008)

¹ See Exhibit 1, IKS Form 8871 Political Organization Notice of Section 527 Status

In January 2010, CSS made the independent decision to make electioneering communications in Massachusetts.³ CSS continued to make disbussements for inside advocacy and electioneering communications in March, April, June, August, September, and October.⁴

Material decisions related to CSS's electioneering communications in 2010 were made independently — not in cooperation, consultation or concert with, or at the request or suggestion of any candidate, candidate's authorized committee, political party committee, or any agents acting on behalf of any candidate, candidate committee, or a party committee. None of CSS's communications were made in response to statements made by any person in the Roll Call or Political articles relied upon as "evidence" of consdination by Ms. Mitchell and Mr. Hanna. 6

2. Legal Amalysis

The primary issue in this matter is whether CSS's October electioneering communications were coordinated with, and thus resulted in an excessive contribution to, any Federal candidate. Under the Act, a payment for a communication that is made by any person "in cooperation, consultation, or concert, with or at the request or suggestion of" a candidate or his or her agent constitutes an in-kind contribution to that candidate.

Ms. Mitchell and Mr. Hanna's complaint inaccurately alleges that CSS's Outober electioneering communications that clearly identified both U.S. Senate and U.S. House candidates were made in response to statements made by House Members in the Roll Call and Politico Stories.

The Commission's regulations provide a three-prong test to determine whether a communication is coordinated: (1) payment for communication must be made by a person other than a candidate committee, (2) the communication must meet the "content" standard, and (3) the parties must engage in activity that meets the "conduct" prong. All three prongs of the test must be satisfied for a coordinated communication to occur. It

³ See Builfibh 3, FBC Foun 9 (Jan. 13, 2010) and Dedistration of Jeretics Van Est at 7 (Jan. 6, 2011)

⁴ See Exhibits 4, 5, 6, and 7, IRS Political Organization Reports of Contributions and Expenditures dated April 15, 2010, July 15, 2010, October 15, 2010, and October 21, 2010. See CSS's October 2010 PEC Form 9s at http://guery.nietuss.com/csi-bit/fecims/7C30901259

See Van Bas Dock at 7

See Van Ess Decl. at 4. The two articles relied upon by Ms. Mitchell and Mr. Hanns are Anna Palmer, Democrats Angry that Liberal Groups Aren's Helping, Roll Call (Sep. 17, 2010) and Innathan Miller, Dems Lag Badly in Outside Spanitrig, Politica (Sep. 22, 2010). (the "Roll Call and Politica Staries")

⁷2 U.S.C. \$441a(a)(7)(B)(i); i1 C.F.R. \$109.2i(b)(i)

² U.S.C. \$441a(a)(7)(B)(1); 11 C.P.E. \$109.21(b)(1)

^{9 11} C.F.R. §109,21(a) 10 11 C.F.R. §109,21(a)

CSS January 13, 2011 Page 3

The payment prong and the content prongs of the test were satisfied but the conduct prong was not. The payment prome of the text was natisfied because the communications were paid fin by a puren, CSS, other than a Federal captiniste, the pundidate's aminorized permuittee. or policinal party committee, or any agent of the foregoing. 11 The "content" prong of the test with also satisfied because some of CSS's October communications were electioneering communications. 12

The conduct prong, however, was not met. The conduct prong requires that the parties engage in at least one of six conduct standards. In this matter, the alleged improper conduct is that CSS made communications at the request or suggestion of a candidate, his or her authorized committee, a pulitibili party or any agent of the foregoing. 14

Ms. Mitcheld and Mr. Hunga importantly separat that the Roll Call and Politico Stories "clearly establish that Representatives Pelosi and Larson 'requested' that outside organizations spend on behalf of Democratic candidates, while unramed aides reiterated the requests and added retaliatory threats." They do not claim that any of the other conduct standards required under 11 C.F.R. §109.21(d) were met.

In this matter, the parties did not engage in activity that met the conduct prong of the coordination test. First, none of CSS's communications were made at the request or suggestion of a candidate, his or her authorized committee, a political party or any agent of any of the foregoing. 16 In his declaration, Mr. Van Ess confined that all material decisions refused to CSS's communications were made independently of any conditate, their authorized committee, a party committee or they of their actibits. 17

Second, the person who made the material decisions related to CSS's communications did not learn about the statements made in the September Roll Call and Politico Stories until receiving Ms. Mitchell and Mr. Hanna's complaint in November. Mr. Van Ess did not even read the stories before CSS made its communications so it is not possible that they were made in response to the articles. 18

Third, general public requests by a mindidate do not fulfill the constact prong of the coordinative regulations. The Corresponding on stated in its Explanation and Distillution for the combination stattletions that:

^{11 11} C.F.R. §109.21(a)(1)

^{12 14} C.F.R.

^{15 11} C.F.R. §109.21(d)(1)-(6)
14 11 C.F.R. §109.21(d)(1)
15 Complaint at 6

¹⁶ See Van Ess Decl. at 8

¹⁷ See Van Ess Deck at 7

¹⁸ See Van Ess Decl. at 5

The "request or suggestion" conduct standard in paragraph (d)(1) is intended to cover requests or suggestions make to a school audicine, but not those offered to the public generally. For example, a request that is posted on a web page that is smallable to the general public is a request to the general public and done not trigger the conduct standard in paragraph (d)(1), but a request posted through an intranet service or sent via electronic mail directly to a discrete group of recipients constitutes a request to a select audience and thereby satisfies the conduct standard in paragraph (d)(1). Similarly, a request in a public campaign speech or a newspaper summiscentant is a request to the general public and is not severed, but a request thering a meson to an audience at an invitation-only dismer or during a meson to an audience at an invitation-only dismer or during a meson to an audience at an invitation-only dismer or during a meson to an audience at an invitation is a request to a select audience and thereby satisfies the conduct standard in paragraph (d)(1).

All of the statements found in the Roll Call and Politico Stories relied upon by Ms. Mitchell and Mr. Hanna to support their complaint against CSS are general public statements that do not satisfy the conduct prong of the FEC regulations. Since no one materially involved with CSS's communications had, or received, any private or elscrete communications with ar from Representative Pelosi, Representative Larson, any candidate, or their agents regarding CSS's communications them all of the infinementation found in the Roll Call and Politics Stories are general public statements with regard to CSS. And, as noted above, Mr. Van Eas did not evan read the staries before CSS made it's communications in October.

Finally, the Complaint does not include any allegation or evidence that Representative Pelosi or Larson were agents with "actual authority, either express of implied" to act on behalf of any other candidate. As a result, even if Representative Pelosi or Larson did request or suggest that some third party organization create, produce, or distribute a commission in the candidate's district it would not result in coordination. The Commission explained:

Where Candidate A requests of suggests that a third party pay for an ad separately advocating the election of Candidate B, and the third party publishes a summunication with an reference to Candidate A, no coordination will result between Candidate B and the third party payor. However, if Candidate A is an 'agent' for Candidate B ... then the communication would be coordinated.²⁴

¹⁹ FEC, Explanation and Justification, Coordinated and Independent Expenditures, 58 Fed. Sing. 421, 432 (Jan. 3, 2003)

²¹ FEC. Explanation and Justification, Coordinated and Independent Managiditures, 58 FeE. Reg. 421, 431 (Jan. 3, 2003)

CSS January 13, 2011 Page 5

CSS did not have any communications with Representative Pelosi or Larson concerning its communications. Therefore, the "conduct" prong sould not be met even if Representative Pelosi or Larson were setting as agents for another candidate.

Contrary to the assertions made in the complaint, CSS's electioneering communications were not made at the request or suggestion of any candidate, party committee, or their agents. CSS did not engage in any activity that satisfied the "conduct" prong of the Commission's coordination test. Therefore, CSS's electioneering communications cannot be deemed coordinated communications under the Commission's regulations.

3. Correlusion

CSS's Ootober electioneering communications were not made in coordination with any members of the U.S. House of Representatives.

Material decisions related to CSS's electioneering communications were made independently – not in cooperation, consultation or concert with, or at the request or suggestion of any candidate's authorized committee, political party committee, or any agents acting on behalf of any candidate, candidate committee, or party committee. C35's communications were not made in response to the Roll Call and Politico Stories.

CSS respectfully require that the Commission and no measure to betieve that it violated the Act or Commission meguintions and that it close this meatter promptly.

Sincerely

James Limb

Form **8871** (Rev. Jazy 2003)

Political Organization Notice of Section 527 Status

ONE No. 1545-1603

Par I General Information	
Name of organization Citizans for Strength and Security	Employer Identification number 26 - 3220209
2 Mailing address (P.O. box or number, street 1717 M.Street, NW. \$342	nt, and room or suite number)
City or town, state, and ZIP code Waikington, DC 20036	
3 Check applicable box: ∠ Initia	l notice Amended notice Final notice
4a Date established 08/22/2008	4b-Date of meterial change 08/22/2008
5 E-mail address of organization no@email	
Sa Name of custoffina of manyth	6b Custodian's address
Lors Haggard	29 Briarwood Drive
	Ringgold, GA 30736
7a Name of contact person	76 Cantact pagain's address
Lore Haggard	29 Briarwood Driwi
	Ringgold, GA 30736
8 Business address of organization (if differe 1717 M Street, NW 3342	nt from militing address shows above). Number, street, and room or salte number
City or town, state, and ZIP code Washington, DC 20036	
9a Election numberity	96 Election authority identification anumber
NONE	
Part II Notification of Claim	of Exemption From Filing Certain Forms (see instructions)
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Part III Papose	
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Part IV	List of Ali Related En	ities (see instructions)		
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Lore Haggard		Treasurér	29 Briarwood Drive	
			Ringgold, QA 30736	
	Internal Revenue Code, and the and belief, it is true, correct, and	l i have extrained this notice, in	in Part I is to be treated as a tax-exempt on cluding ecompanying schedules and state I am the official authorized to sign this repo	ments, and to the best of my knowledge
	below. Lore M Haggard		08/22/2008	
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FEC FORM 9 24 HOUR NOTICE OF DISBURSEMENTS/OBLIGATIONS FOR ELECTIONEERING COMMUNICATIONS

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FEC FORM 9 24 HOUR NOTICE OF DISBURSEMENTS/OBLIGATIONS FOR ELECTIONEERING COMMUNICATIONS

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Form **8872**

Political Organization Report of Contributions and Expenditures

OMB No. 1545-1696

► See separate instructions.

A Hor tile political beginning 01/01/2010	and cuding 03/31/2(46	
B Check applicable box: 🗹 Initial report _	. Change of address Amended report	Final report
	Charle or Anneis - vantansie telbier	
1 Name of organization		Employer Identification number
Citizens for Strength and Security		26 - 3220209
2 Mating address (P.O. box or number, street, and ro 1718 M Street, NW 8342	om or suite number).	
City br town, stang and ZIP code		
Washingster, DC 20036		
3 E-mail address of organization:		4 Date organization was forwed:
no@email		08/22/2008
Sa Name of custodien of records	5b Cinstedian's address	
Loru Haggard	29 Briarwood Drive	
-	Ringgold, GA 30736.	
6a Name of control person	66 Centect person's refeires	•
Lore Heggard	29 Briarwood Drive	
	Ringgold, GA 30736	
Washington, DC 20036		
f Type of report (check exty one box)		
∠ First quarterly report	Monthly report for the end	nih of:
(due by April 15)		wing the mouth shown above, except the
Second quarterly report	December report, which is	
(due by July 15)		hit 13th or 12th divigious the slottion)
Third guarterly report (due by October 15)	(1) Týpé ef distiba: (2) Däte-of-söitian:	
Year-ups report	(3) For the state of:	
(duer bay Ja pesary, 3%)	Post-accept election appe	t (ight: ph this Yelfa diel Olgic Siether die eine
Mid-year region (Note-edection	(1) Diete infichentien:	
year maily-due by July 31)	(2) For the state of	
Total senumb of paperted contributions (total from	ell stracked Schedules A)	
10 Total special of reported expenditures (total from		1000256
Under penalties of perjury, I declare that I	have examined this report, including accompany	ng schedules, and statements, and to the best of my knowled
and belief, it is true, confect, and complete Loca Hagnard	5·	0471572010
Sign		*
Hara Daniel		
17878 V Signature of authorized official		Date

Schedule A Itemized Contributions		Schedule
Contributor's name, mailing address and ZLP code Service Employees Interpational Union	Name of contributor's employer	
1 800 Minsachuaetts Ave NW	Contributor's serugation	Amount of contribution
Washington, DC 20036	N/A	\$ 10000
	Aggregate contributions year-to-date \$ 200000	Date of contribution 01/12/2010
Contributor's name, malling address and ZIP code	Name of contrilinuar's employer	
Communications Workers of America	NA	
501 3rd Samer, NW	Contributor's encupation	Amount of contribution
Washington, IRC 2000!	N/A	\$ 100000
	Aggregate cemirikutizma year-lo-datz \$ 100000	Date of contribution 01/13/2010
Contributor's name, mailing address and ZIP code Service: Employees International Union	Name of contributor's employer N/A	
1800 Massachusetts Ave NW	Cantributor's occupation	Amount of contribution
Wintington, DC 20076	N/A	\$ 100000
	Aggregate contributions year-to-date.	Date of contribution
	\$ 200000	01/13/2010
Contributor's name, mailing address and Zif cude	Name of contributor's employer	
Donald Sussman	Paloma Pasinom	
Greenwich Contre	Contributor's occupation	Amount of contribution
Groenwich, CT 06836	Chairman Aggregate countilyatitus: yeur-lo-date	S 100000 Data of contribution
	\$-100000	01/14/2010
Contributor's sense, mailing address and ZIP code	Name of cuntribular's employer	
UFCW	N/A Contributor's escapation	Amount of contribution
1775 K Street, NW Washington, DC 20006	N/A	3 100000
withington, pe soos	Aggregate confributions year-to-date	Date of contribution
	\$ 100000	.01/£3/2010
Contributor's same, mailing address and ZIP code	Name of contributor's employer	
Foundation For Patients Rights	N/A	
1718 M Street, NW 3107	Centribator's escapation	Amount of contribution
Washington, DC 20036	N/A	\$ 250000 Date of contribution
	Aggregate contributions year-to-date \$ 250000	01/19/2010
Contributor's name, mailing address and ZIP code	Name of contributor's employer	
Americans For Stable Quality Care	N/A	
2200 17th Street, NW	Contributor's occupation	Amount of contribution 5.180600
Washington, DC 20009	N/A Aggregate egnasilmolans year-to-date	S 180900 Date of contribution
	2 180000	03/06/2010

Schaude B: Itemized Expenditures		Schedule
techilini'i name; maling addrim anii ZIP code	Name of recipient's employer	Amount of Expenditure
UC Media	LUC Media	\$ 250000
5 Whizloth Place 8201	Recipients's occupation	Date of expenditure
Abricus, GA 30064	Media Firm	01A3/2010
'arpain of expenditure Acdis Buy		
letiquent's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
.UC Media	LUC Media	\$.32,5000
5 Whitlack Place S201 Geriette, GA 30064	Rotiplents's occupation Media Firm	Datë of expenditure · 01/15/2010
urpose of expenditure		••••
Acdia Bay		
legigips's name, mailing andress and ZIP code	Name of recipient's employer	Amount of Expenditure
Bully Risips Interactive; LLC	Bully Pulpit Interactive, LLC	\$ 70000
750 K. Street. Suite 450 Vashingjon, DC 20086	Recipients's occupation. Media Firm	Saté àil expenditure 01/19/2010
'urjiese of expenditure		
sternet Advertising/Production		
letipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
Pully PhipH Interestive, LLC	Bully Pulpit Interactive, LLC	\$ 30000
798 M. Sixoet State 450. Vashington, DC 20006	Recipionis's occupation Media Pirm	Data of expenditure 01/19/2010
arpeze of expenditure		
nternet Advertising/Production		
letiplent's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expériditate
.UC Media 5 Whittest Place \$20	LUG Media	5 85900'
o vignacii filor 527) Agrietta, GA 2004	Recipients's occupation Medio Firm	Date of expenditure 01/29/2010
Perpos of expenditure Andia Buy		
Recipiont's name, mailing address and ZLP eque	Name of recipions's employer	Amount of Expanditure
hroe Pothi Media, LLC	Three Paint Media, LLC	\$ 33157
000 Patering Street, NW Suite 500	Recipients's eccupation	Date of expenditure
Vashington, DC 26567	Media Firm	01/30/2010
'urpese of expenditure Acque Smiphition		
leulpieut'n name, malijg address und Jill code	Name of custolant's engineer	Amount of Expenditure
one Heateard	Self-Employed	\$ 19900.
9 Briarwood Drive	Recipients's occupation:	Date of expenditure
Imperid RA 30736	Accounting	61/31/3∕β4 €
erpose of expenditure		
trefficatio anno, malling address and ZIV cade	Name of resipient'enagleyer	Amittat of Expedictate
BRT	BB&T	3 L87: Date of expenditure
209 Greenibott-Drine \$1020 IcLean, VA 72192	·Racipiciti's occupation Bank	02/22/2010
urpose of expenditure Ani: Poss		
leofgrient's dame, mailing objects and ZIP code	Name of recipitatio empiritat	Afteunfaf Expenditure
Ventus Restarab & Consulting	in Veritai Patatarch & Consulting	\$ 10000
ns Financial Contra, 3345 430 Shackleftint Road	-Bricibies (n. i entañoldos	Date of expenditure
ițtip Rusk, ÁR 722i 1	Research	63/1 2/3 010

Recipient's name, mailing address and ZIP code BB&T 8200 Greensbero Drive \$1020 McLapp, VA 22102	Name of recipient's implinyer BB&T Recipienty's occupation Bank	Ameunt-of-Expenditure \$ 76 Date of expenditure 03/22/2010
Purpose of expenditure Bank Fees		
Reciptent's name; mailing address and ZIP code Arkansaus For Change 1818 N. Taytor St., #\$28 Little Rock, AR 72207	Name of recipient's employer Arkansam For Change Recipients's occupation Political Organization	Amount of Expenditure 3 190000 Date of expenditure 03/10/2010
Purpose of exponditure Contribution		
Recipient's name, mailing address and ZIP code Three Point Media, LLC 1000 Potomac Street, NW Suite 500 Washington, DC 2007	Name of recipions's employer Three Point Media, LLC Recipionts's occupation Media Firm	Amount of Expenditure 5-15877 Date of expenditure 01/25/2010
Purpage of expenditure Media Praduction		
Recipient's name, malling address and ZIP code BB&T 8200 Greensboro Drive \$1020 McLean, VA 22102	Name of recipient's employer BB&T Recipients's occupation Bank	-Amount of Expenditure 5.59 Date of expenditure 01/21/2010
Purpuse of expenditure Bank Fees		

Form **8872** (Nomember 2002)

Political Organization Report of Contributions and Expenditures

OMB No. 1545-1698

Department of the Treasury

A For the period beginning 04/01/2010	and ending	96/30/2010	
			
B Check applicable box: 👤 Initial repo	ort Changii of addrei	6 Amended report	ــــ Firial repoint ـــــ
		- en minimi mini	
1 Name of organization			Rimplayer identification number
Citizens for Strength and Security			26 - 3226209
2 Mailing advirons (P.O. bon or samber, stre	et, and room or suite pumbe	r)	
1718 M Street, NW 5342		•	
City or News, state, and ZIP code			
Washingum, IPC 20036			
3 E-mail address of organization:			4 Date organization was formed:
no@email			08/22/2008
			
Se Name of custodien of records		So Custodian's address	
Loro Haggard		29 Briarwood.Drive	•
		Ringgold, GA 30736	
Sa Name of contact person		6 Contact person's address	
Lon Haggard		29 Briggwood Drive	
_		Ringgold, QA 30736	
S. Suntana address of a constraint of differen			
7 Business address of organization (if different and a second a	ent from mailing address sho	wa sbove). Namber, street, a	ng toom ot salts samper
1718 M Street, NW S342			
City or town, state, and ZIP code			
Washington, DC 20036			
\$ Type of report (check early one box)			
First quarterly report		Monthly report for the mon	ath af-
(dan by April 15)			ving the menth ghown above, except the
∠ Scooled quarterly report		December report, which is	due by January 31)
(due by July 15)			the-12th or 15th day before the election)
Third quarterly report (due by October 15)		(1) Type of election: (2) Units of election:	
_ Year and refers		(3) For the superior	
(due the Intiably 31)		Post-general effection report	t (केन्ट केन्ट बोर्स डेक्सेंट क्रेक्न क्रीक क्राक्रिक क्रोसिट कर्ने
Mid-year report Mitto-claithfu		(1) Dick of Claudini	,
year only-due by July 31)		(2) For the suite of:	
			
9 Total senomat of regarded contributions (to	otál from all attached-Sched	nies Alainanna marianna marianna	9. B-116500
	•		
10 Total amount of reported expenditures (to	otal from all attached Sched	nies B), washing	
	lere that I have examined this		ng schedules and statements, and to the best of my knowled
Lore M. Heggard	• -		07/15/2019
Sign			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Admete.	-de-de-l	·) <u></u>
Hore Signature of authorized	erricial		/ Daté

Form 8872 (11-2002)		
Schedule A Itemized Contributions		Schedule
Contributor's name, malling address and ZIP code John C. Windsor P.O. Sox 4895 Jackson, MS 39296	Name of contributor's employer Self Employed Contributar's occupation Attomor Aggregate contributions year-to-date 3 7500	Amount of contribution & 7500. Date of contribution 96/01/2010
Centributor's name, mailing address and ZIP code John R. Windsor 13134. Acquay Road Oxford, MB 38655	Name of contributor's employer Self Employed Contributor's ecopation Attorney Aggregate constitutions year-to-ditt \$ 7580	Amount of contribution \$7500 Date of contribution 06/01/2010
Contributor's name, malling address and ZIP code Christopher D. Jones P.O. Box 250 Boogsville, MS 38829	Name of contributor's employer Self Employed Contributor's occupation CPA Aggregate contributions year-to-date \$ 1500	Amount of contribution \$ 1500 Date of contribution 06/29/2010
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW 8200 Washington, DC 20005	Name of contributor's employer NVA Contributor's occupation NVA Aggregaté contributions year-lu-date \$ 100000	Amount of contribution \$ 100000 Date of contribution 04/07/2010

Form 9872 (11-2002)		
Self-faule B Itemized Expenditures		Schedule
Recipient's name, mailing address and ZIP cade Three Point Media 1000 Potomec Street, NW 8500 Washington, DC 20007	Name of recipient's employer N/A Recipients's occupation N/A	Amount of Expenditure \$ 1911 Date of expenditure 04/12/2010
Purpetti of expenditure Media Production		
Recipient's name, mailing address and ZIP code LVC Modia 25 Whitlock Place S201 Maricta, GA 30064	Name of recipient's employer N/A Recipienty's occupation N/A	Amount of Expenditure \$ 76375 Date of expenditure 0407/2010
Purpose of expenditure Media Buy		
Recipient's name, millinguildress and ZIP code Ourse Beychnik Johnson, Inc. 123 Napoleon Street Boton Rauge, LA 70802	Name of recipient's employer N/A Recipients's occupation N/A	Amount of Expenditure \$ 15000 Date of expenditure 06/29/2010
Pargos of expenditure Direct Mell		

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Form **8872**

Political Organization Report of Contributions and Expenditures

► Bee separate instructions.

OMB No. 1545-1698

3 Check applicable box: 🗘 Initial report 🔔	and ending 09/20/200
Check applicable box: 🔟 Initial report 🔃	Phonon affectations throughout though the Conference
• •	Change of address Adminded report Final report
Name of organization	Employer identification auguber
dizens for Strength and Security	26 – 3220209
Mailing address (P.O. feet ut nitalier, street, and rec	er sulte number)
118 M Street, NW 5342	
ity on tewn, sun _{th} and 21 P educ	
/ashington, DC 20046	
E-mail address of organization:	4 Date organization was formed:
o@emsil	08/22/2008
Name of custollian of records	56 Custodian's address
ore Haggard	29 Briszwood Drive
	Ringgold, QA 30736
a Name of contact person	6b Contact person's address
	and the birth of the
•	29 Briarwood Drive
ora Haggard	29 Briarwood Drive Ringgold, GA 30736
ora Haggard Business address of organization (if different from more) 18 M Sweet, NW 9342 ity or town, state, and ZIP code	29 Briarwood Drive
ora Haggard Business address of organization (if different from mo 718 M Swant, NW 9342 ity or town, state, and ZIP code /ashington, DC 20036	29 Briarwood Drive Ringgold, GA 30736
Dra Haggard Business address of organization (if different from met P18 M Street, NW S342 ity or town, state, and ZIP code /askington, DC 20036 Type of repart (chirch-may one box)	29 Briarwood Drive Ringgold, GA 30736
Business address of organization (if different from more is M Street, NW S342 ity or town, state, and ZIP code /ashington, DC 20036 Type of repant. (clinick-staly one box) . First quarterly report (due in Aptil 15)	29 Brisrwood Drive Ringgold, GA 30736 ling address shown above). Number, street, and room or suite number — Monthly report for the month of:. (due by the 20th day following the month shown above, except the
Business address of organization (if different from merits or town, NW \$342. Ity or town, state, and ZIP code /ashington, DC 20036 Type of repart (chisch-staly one box) First quarterly report (due by Apt# 15) Second quarterly report	29 Brisrwood Drive Ringgold, GA 30736 ling address shows above). Number, street, and room or suite number
Business address of organization (if different from me 718 M Street, NW S342 ity or town, gate, and ZIP code /askington, DC 20036 Type of repaid. (elibel-staly one box) First quarterly report (due by April 13) Second quarterly report (due by Jaly 15)	29 Briarwood Drive Ringgold, GA 30736 ling address shows above). Number, street, and room or suite number — Monthly report for the month of: (due by the 20th day following the month shows above, except the December report, which is due by January 31) — Pre-eléction report (due by the 12th or 15th day before the election)
Business address of organization (if different from meris M Sweat, NW S342 ity or town, gates, and ZIP code askington, DC 20036 Type of repairs (chick-staly one box) . First quarterly report (due by Aptil 13) . Second quarterly report (due by July 15) . Third quarterly report	29 Brisswood Drive Ringgold, GA 30736 ling address shows above). Number, street, and room or suite number — Monthly report for the month of: (due by the 20th day fullowing the month shows above, except the Discenter report, which is due by January 31) — Pre-eléction report (due by the 12th or 15th day before the election) (1) Type of eléction:
Business address of organization (if different from met 718 M Street, NW S342 City or town, state, and ZIP code Vashington, DC 20036 Type of repaint (chircle andy one box) First quarterly report (due by Auty 15) Second quarterly report (due by July 15) Third quarterly report (due by October 15)	29 Briarwood Drive Ringgold, GA 30736 ling address shows above). Number, street, and room or suite number — Monthly report for the month of: (due by the 20th day following the month shows above, except the December report, which is due by January 31) — Pre-eléction report (due by the 12th or 15th day before the election)
Business address of organization (if different from me 718 M Street, NW S342 ity or town, state, and ZIP code /askington, DC 20036 Type of repairs (cibicle maly one box) First quarterly report (due by July 15) Third quarterly report	29 Brisswood Drive Ringgold, GA 30736 ling address shows above). Number, street, and room or suite number — Mouthly report for the month of: (due by the 20th day following the month shows above, except the Discenter report, which is due by January 31) — Pre-election report (due by the 12th or 15th day before the election) (1) Type of election: (2) Data ef election:

Schoule A Itemized Contributions.		Schedule
Contributer's name, mailing address and ZIP code Brownstain Hysti Father Schenk 410 Seventeenth Streat Suite 2280 Denver, CO 80202 - 4432	Name of contributor's employer Brownstein Hyan Parker Schweck Contributor's occupation Law Firm Aggregate contributions year-to-date \$ 5000	Amount of contribution \$ 5000 Date of contribution 07/21/2010
Contributor's name, mailing address and ZIP code Democratic Governors Association NF Corporate 1401 K Street, NW Suise 288 Washington, DC 2000S	Plane of contributor's employer Democratic Governors Association NF Corporate Contributor's accupation Political Organization Aggregate contributions year-to-date \$ 1 00000	Amount of contribution \$ 100000 Date of contribution 08/05/2010
Contributor's name, mailing address and ZIP code Democratic Governors Association NF Corporate 1401 K Street, NW Suite 200 Washington, DC 20005	Name of contributor's employer Democratic Governon Association NF Corporate Contributor's occupation Political Organization Aggregate cumulations year-tandate \$ 1100000	Amount of contribution \$ 1000000 Date of contribution 09/20/2010
Contributor's name, mailing address and ZIP code American Federation of Teachers 555 New Jersey Ave., N.W. Washington, DC 20001	Name of contributor's employer American Pedenstica of Teachers Contributor's accupation Political Organization Aggregate constitutions year-to-date \$ 500000	Amoupt of centribution \$ 500000 Date of contribution 09/24/2010

Scheoole : Itemized Expenditures		Seheiduk
Recipient's name, mailing address and ZIP code 3B&T	Name of recipient's employer BB&T	Amount of Expenditure \$ 16
1200 Greensboro Dr	Recipients's occupation	Date of expenditure
AcLem, VA 22102	Bank	GB/21/2010
'arpase și expenditure lank Fees		
lecipient's name, malking address and ZIP code	Name of recipient's employer BB&T	Amount of Expenditure \$ 28
200 Greensboire Dr	Recipients's neceptation	Date of expenditure
(d.em. VA 22102	Bank	07/21/2010
rupost of expenditure lask Foot		
lociplant's name, untiling address and ZIP code	Name of recipient's employer	Amount of Expenditure
MS, les	IMS, Inc.	\$ 7500
1809 Margan Drive Cheary Chase, MD 20815	Recipients's occupation Research	Date of expenditure 09/09/2010
Parpose of expenditure Lesearch		
Recipient's name, mailing address and ZIP code	Name of recipiont's employer	Amount of Expenditure
Azalene Line Karenesh, Inc.	Azalone Liszt Research, Inc.	\$ 41500
160 Commence Street 4th Floor Montgomery, AL 36184	Recipients's occupation Research	Date of expenditure 08/15/2010
Purpose of expanditure Research		
Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
ora Haggard	Self Employed	\$ 3000
9 Brierwood Crive	Recipients's occupation	Date of expanditure 09/09/2010
Ringgold, GA 30736	Compliance/Accounting	09/09/2010
Puepase of aspiralitaire Accessating Fase		
Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
Veterfiedt Strafglet 010 Wisconsin Avenue, NW S200	Waterfront Stategies Reciplents's occupation	3-75900Q Bate of expenditure
Vashingtin, DC 20007	Media Pirm	09/20/2010
'urpose of expenditure Aedia		
tecipient's unuse; mulling eddress and ZIP code	Name of resignant's employer	Amount of Expenditure
Vaterfrest Strategies	Waterfried Strategies	\$ 74346Q
010 Wisconsin Avtaus, NW 5900 Vashininin DC 20907	Recipiestà's occupation Media:Firm	Date of espenditure 09/24/2010
l'alposé of expéndituré Mella		•

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Exhibit 7

(November 2002)

Sign Here

Signature of authorized official

Political Organization Report of Contributions and Expenditures

Date

QMB No. 1545-1696

nt of the Titl Internel Revenue Service See separate instructions. A For the period beginning 10/01/2010 and ending 10/13/2010 ∠ Initial report — Change of address __ Amended report B Check applicable box: __ Final report ! Name of organization Employer identification samber Citizens for Strength and Security 26 - 3220209 2 Maling address (F.O. hay as transber, street, and room or suite number) 1718 M Strept, NW S342 City or town, store, and ZIP com Washington, DC 20036 3 E-mail address of organization: 4 Date organization was formed: 02/22/2008 Sa Name of curudan of records -5b Custodian's address 29 Briarwood.Drive Lore Haggard Ringgold, GA 30736 6b Contiét person's address Sa Name of contact person 29 Briarwood Drive Lora Haggard Ringgold, GA 30736 7 Business address of organization (if different from stalling address shown above). Number, street, and room or suite number 1718 M Street, MW S342 City or town, state, and ZIP code Washington, DC 20036 8 Type of regent (check early one box) Monthly report for the month of: __ First quartetly report (due by the 20th day following the month shown above, except the (due by Aptil 15) Second quarterly report (due by July 15) December report, which is due by January 31) ✓ Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election: general
(2) Date of election: 11/02/2010 __ Third quarterly report (due by October 15) (3) For the state, of the stat Year-sou repos (due by January 21) Mid-mar impart (Namelection year only-dut by July 31) (2) For the state of: 9 Total amount of reported contributions (total from all attaches Schedules A)...... 10 Total amount of expected expenditures (total from all attached Schedules S)......1Q. **\$ 8849**32 Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to this best of my-knowledge and baller, it is true. Correct, and complete. 10/21/2010 Lora M. Raggard

Schedule A Itemized Contributions		Schedule /
Contributor's name, mailing address and ZIP code Democratic General's Association 1401 K Street, NW 5200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date 3 2700000	Amount of contribution 5 50000 Date of contribution 10/01/2010
Contributor's name, mailing iddress and ZIP code Démocratic Governor's Association 1401 K Titreet, NW \$200 Washington, BC 22005	Name of contributor's estipleyer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 2700000	Amount of contribution 2.5000p Date of contribution 10/01/2010
Contributer's name, mailing address and ZiP code Pharmaceutical Research & Manufacturers of America 950 F Street, NW \$300 Washington, DC 20004	Name of contributar's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 775000	Améent of centribution \$ 775060 Date of contribution 10/06/2010
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW \$200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate compibutions year-to-date 3 2700000	Amount of contribution \$ 500000 Date of contribution 10/08/2010
Contributor's mame, widding address and ZIP code SEIU MD/DC State Council Ste 410, 3700 Koppers Street Baltimore, MD 21227	Name of contributor's employer N/A Contributor's employedon N/A Aggregate contributions year-to-date \$ 150800	Amount of contribution \$ 150000 Date of contribution 10/12/2010

Name of recipient's employer N/A Recipients's occupation N/A	Amount of Expenditure 8 798544 Date of expenditure 10/07/2010
Name of recipient's employer	Ameant of Expenditure
N/A Recipients's occupation	\$ 56088 Date of expenditure
N/A	10/13/2010
	N/A Recipients's occupation